

resolute
Forest Products

5300 Cureton Ferry Road Post Office Box 7 Catawba, SC 29704-0007

FED EX NO. 7712 3432 5420

January 22, 2018

Ms. Connie Turner, Manager Air Toxics Section SCDHEC Bureau of Air Quality 2600 Bull Street Columbia SC 29201-1708

Re: MACT II Excess Emissions and Monitoring System Performance Reports

Air Permit No. TV-2440-0005

Dear Ms. Turner:

The purpose of this submittal is to meet the quarterly excess emission reporting requirements applicable to the Resolute Forest Products – Catawba Mill associated with the National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry (40 CFR 63, Subpart MM). The sources covered under Subpart MM are the No. 2 Recovery Boiler, No. 3 Recovery Boiler, No. 2 and No. 3 Smelt Dissolving Tank Vent, and the No. 2 Lime Kiln. This submittal meets the requirements of the Excess Emissions and Continuous Monitoring System (CMS) Performance Report pursuant to Sections 63.867(c) and 63.10(c), respectively.

Excess emissions and CMS downtime for the reporting period were less than 1% and 5% respectively for all systems. Therefore, only the summary reports are attached as allowed in §63.10(e)(3)(vii). For SSM purposes when an emission has occurred, specific information about the type and duration is reported on the enclosed log(s). All SSM events were consistent with the SSM Plan.

Based on information and belief formed after reasonable inquiry, I certify to the best of my knowledge, that the statements and information in this submission are true, accurate, and complete.

If you have any questions or require additional information, please contact Mike Swanson, environmental engineer at (803) 981-8010 or mike.swanson@resolutefp.com.

Sincerely,

Wayne Griffin General Manager – Catawba Operations

Enclosures: MACT II Logs

cc: SCDHEC – BAQ, Technical Management Section

Alex Latta, Midlands EA Lancaster

**EPA Region 4** 

Environmental File 232.14

### GASEOUS AND OPACITY EXCESS EMISSION AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

| Pollutant:                                       | Opacity  |
|--|--|
| Time Period:                                     | Minutes  |
| Reporting Period:                                | October 1, 2017 through December 31, 2017              |
| Process Unit Description:                        | No. 2 Recovery Boiler                                  |
| Company:   | Resolute Forest Products – Catawba Mill                |
| Emission Limits:                                 | 35%  |
| Monitor Manufacturer(s) and Model Number(s):     | Teledyne Monitor Labs / Light Hawk 560 Opacity Monitor |
| Last CMS Certification or Audit Date:            | Certification: October 20, 2006                        |
|  | Audit: September 29, 2017                              |
| Total Source Operating Time in Reporting Period: | 131,160 minutes  |

## **EMISSION DATA SUMMARY**

| Reason for Excess Emissions             | Duration (minutes) |                         |
|---|--------------------|-------------------------|
|   | Over 35%           | Over 20% for 60 minutes |
| A. Startup/Shutdown                     | 0                  | 0                       |
| B. Malfunctions                         |                    |                         |
| Process/Instrument System               | 0                  | 0                       |
| Control Equipment                       | 120                | 90                      |
| Fuel Problems                           | 0                  | 0                       |
| Other Known Cause                       | 60                 | 0                       |
| Other Unknown Cause                     | 12                 | 0                       |
| Total Number of Incidents               | 7                  | 1                       |
| Excess Emissions/Process Operating Time | 0.15 %             | NA                      |

### **CMS PERFORMANCE SUMMARY**

| Reason for Monitor Downtime        | Duration (minutes) |
|------------------------------------|--------------------|
| Monitor Equipment Malfunctions     | 2438               |
| Non-Monitor Equipment Malfunctions | 0                  |
| Quality Assurance                  | 0                  |
| Other Known Cause                  | 0                  |
| Other Unknown Cause                | 0                  |
| Total Number of Incidents          | 44                 |
| Percent Monitor Downtime           | 1.86 %             |

There were no changes in the continuous monitoring systems, processes, or control devices since the last reporting period.

| Name/Title: | Wayne Griffin | General Manager |
|-------------|---------------|-----------------|
| Signature:  |               |                 |

### GASEOUS AND OPACITY EXCESS EMISSION AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

| Pollutant:                                       | Opacity  |
|--|--|
| Time Period:                                     | Minutes  |
| Reporting Period:                                | October 1, 2017 through December 31, 2017              |
| Process Unit Description:                        | No. 3 Recovery Boiler                                  |
| Company:   | Resolute Forest Products – Catawba Mill                |
| Emission Limits:                                 | 35%  |
| Monitor Manufacturer(s) and Model Number(s):     | Teledyne Monitor Labs / Light Hawk 560 Opacity Monitor |
| Last CMS Certification or Audit Date:            | Certification: July 31, 2010                           |
|  | Audit: September 29, 2017                              |
| Total Source Operating Time in Reporting Period: | 132,480 Minutes  |

# **EMISSION DATA SUMMARY**

| Reason for Excess Emissions             | Duration (minutes) |                         |
|---|--------------------|-------------------------|
|   | Over 35%           | Over 20% for 60 minutes |
| A. Startup/Shutdown                     | 0                  | 0                       |
| B. Malfunctions                         |                    |                         |
| Process/Instrument System               | 0                  | 0                       |
| Control Equipment                       | 0                  | 0                       |
| Fuel Problems                           | 0                  | 0                       |
| Other Known Cause                       | 126                | 258                     |
| Other Unknown Cause                     | 0                  | 0                       |
| Total Number of Incidents               | 6                  | 2                       |
| Excess Emissions/Process Operating Time | 0.10 %             | NA                      |

### **CMS PERFORMANCE SUMMARY**

| Reason for Monitor Downtime        | Duration (minutes) |
|------------------------------------|--------------------|
| Monitor Equipment Malfunctions     | 0                  |
| Non-Monitor Equipment Malfunctions | 0                  |
| Quality Assurance                  | 0                  |
| Other Known Cause                  | 0                  |
| Other Unknown Cause                | 0                  |
| Total Number of Incidents          | 0                  |
| Percent Monitor Downtime           | 0.00 %             |

There were no changes in the continuous monitoring systems, processes, or control devices since the last reporting period.

| Name/Title: | Wayne Griffin | General Managei |
|-------------|---------------|-----------------|
|             |               |                 |
| Signature:  |               |                 |

### GASEOUS AND OPACITY EXCESS EMISSION AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

| Pollutant:                                       | Opacity                                   |
|--|---|
| Time Period:                                     | Minutes                                   |
| Reporting Period:                                | October 1, 2017 through December 31, 2017 |
| Process Unit Description:                        | No. 2 Lime Kiln                           |
| Company:   | Resolute Forest Products – Catawba Mill   |
| Emission Limits:                                 | 20%                                       |
| Monitor Manufacturer(s) and Model Number(s):     | Monitor Labs USI 550 Opacity Monitor      |
| Last CMS Certification or Audit Date:            | Certification: October 27, 2012           |
|  | Audit: October 2, 2017                    |
| Total Source Operating Time in Reporting Period: | 129,540 Minutes                           |

## **EMISSION DATA SUMMARY**

| Reason for Excess Emissions             | Duration | (minutes)               |
|---|----------|-------------------------|
|   | Over 20% | Over 20% for 60 minutes |
| A. Startup/Shutdown                     | 12       | 0                       |
| B. Malfunctions                         |          |                         |
| Process/Instrument System               | 0        | 0                       |
| Control Equipment                       | 0        | 0                       |
| Fuel Problems                           | 0        | 0                       |
| Other Known Cause                       | 84       | 78                      |
| Other Unknown Cause                     | 6        | 0                       |
| Total Number of Incidents               | 5        | 1                       |
| Excess Emissions/Process Operating Time | 0.08 %   | NA                      |

### **CMS PERFORMANCE SUMMARY**

| Reason for Monitor Downtime        | Duration (minutes) |
|------------------------------------|--------------------|
| Monitor Equipment Malfunctions     | 1663               |
| Non-Monitor Equipment Malfunctions | 80                 |
| Quality Assurance                  | 30                 |
| Other Known Cause                  | 15                 |
| Other Unknown Cause                | 0                  |
| Total Number of Incidents          | 14                 |
| Percent Monitor Downtime           | 1.38 %             |

There were no changes in the continuous monitoring systems, processes, or control devices since the last reporting period.

| Name/Title: | Wayne Griffin | General Manager |
|-------------|---------------|-----------------|
|             |               |                 |
| Signature:  |               |                 |

### GASEOUS AND OPACITY EXCESS EMISSION AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

| Pollutant:                                       | Particulate Matter                                 |
|--|--|
| Time Period:                                     | Hours  |
| Reporting Period:                                | October 1, 2017 through December 31, 2017          |
| Process Unit Description:                        | No. 2 and No. 3 Smelt Dissolving Tank Vent         |
| Company:   | Resolute Forest Products – Catawba Mill            |
| Emission Limits:                                 | 0.2 lbs/ton BLS                                    |
| Operating Parameters:                            | Differential Pressure > 1.5 inches of water column |
|  | Liquid Flow Rate > 65 gpm                          |
| Monitor Manufacturer(s) and Model Number(s):     | DP – Rosemount 3051CD2A02A1AM5E55                  |
|  | Liquid Flow Rate – Foxboro IMT25PDADB10N-AB        |
| Last CMS Certification or Audit Date:            | Certification: August 3, 2004 (both)               |
|  | Audits: 6/22/17 (DP), 6/20/17 (Flow)               |
| Total Source Operating Time in Reporting Period: | 2,191 hours  |

#### **EMISSION DATA SUMMARY**

| Reason for Excess Emissions               | Duration (hrs) |
|---|----------------|
| A. Startup/Shutdown                       | 0              |
| B. Malfunctions                           |                |
| Process System                            | 0              |
| Control Equipment                         | 0              |
| Other Known Cause                         | 0              |
| Other Unknown Cause                       | 0              |
| Total Number of Incidents                 | 0              |
| Excess Emissions / Process Operating Time | 0.00 %         |

### **CMS PERFORMANCE SUMMARY**

| Reason for Monitor Downtime        | Duration (hrs) |  |
|------------------------------------|----------------|--|
| Monitor Equipment Malfunctions     | 0              |  |
| Non-Monitor Equipment Malfunctions | 0              |  |
| Quality Assurance                  | 0              |  |
| Other Known Cause                  | 0              |  |
| Other Unknown Cause                | 0              |  |
| Total Number of Incidents          | 0              |  |
| Percent Monitor Downtime           | 0.00 %         |  |

There were no changes in the continuous monitoring systems, processes, or control devices since the last reporting period.

| Name/Title: Wa | ayne Griffin | General Managei |
|----------------|--------------|-----------------|
| Signature:     |              |                 |